Precision Broadband LLC

June 22, 2018

VIA ECFS

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation
PS Docket 18-64, In the Matter of
Location-Based Routing for Wireless Calls

Dear Ms. Dortch,

Pursuant to Section 1.1206 of the FCC's rules, 47 C.F.R. § 1.1206, this letter provides notice that on June 20, 2018 I spoke by phone with Dr. Eric Burger, FCC CTO, concerning issues related to the above-referenced proceeding.

Dr. Burger and I discussed the potential application of Precision Broadband LLC's ("PBB") fixed broadband location and communications technology under development for use in accurately ascertaining the location of 911 emergency calls from wireless CMRS and non-CMRS IP enabled devices, and the routing of such calls to the location-serving PSAP.

The following topics were discussed:

Primary use-case: In a hybrid device location technology model, PBB's system offers the greatest contribution for 911 location determination and routing in a residential application. Using PBB's system, when a supported device is connected through a broadband connection to a facilities-based ISP, the dispatchable horizontal civic address and vertical location (floor and unit number in a multi-dwelling building) is obtained immediately upon placing the call – prior to routing the call. The address is then used to route the call to the location-serving ESInet and PSAP over the most suitable network (either over the broadband connection or over the mobile carrier's network). Data from the broadband network would be particularly important in high-density indoor situations where other device-based location technologies may be limited and/or take additional time to calculate the location of the caller. Furthermore, in such indoor building instances, the broadband network can, in many cases, offer a superior connection between the caller and the PSAP telecommunicator as well as potentially offer a more reliable option for dial-back purposes.

Commercial application: In large commercial buildings, PBB's system could also be used for providing an accurate civic location to immediately route 911 calls to the correct location-serving PSAP where a single broadband point-of-entry serves a specific civic street address. This would ensure that the call is routed first to the correct PSAP while simultaneously providing a dispatchable civic street address, even if the exact location data of the caller in the building may arrive seconds later using an alternate method (e.g., device-based technology).

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ISPs Roles and Responsibilities: By enabling the fixed broadband platform for 911, a third location and transport network for emergency services is established – increasing location accuracy, call routing, capacity, redundancy and reliability. We discussed the role and requirements of the facilities-based ISPs to support such a system. I explained that, using PBBs architecture, the demands on the ISPs would be minimal since most of them would be leveraging their existing service provisioning systems for location, and traffic prioritization capabilities to ensure Quality-of-Service. They can also support direct VPN connectivity from their managed network to the ESInet to create a secure connection such that no 911 traffic traverses the public Internet.

ISPs Incentive for Participation: We acknowledge that there is a question about the likelihood of whether the ISPs would support such a service. Admittedly, we believe that there would probably have to be some legal or regulatory imposed obligation along with an incentive for the ISPs to participate. As we explained in our comments to this proceeding on May 1, 2018,[1] because the broadband network would be actively utilized for 911 purposes, there would be a legal basis for assessing 911 fees on broadband service similar to landline and wireless telephone services. ISPs could be reimbursed for their compliance costs out of these funds similar to how they are able to recover their costs for complying with law enforcement requests under the Communications Assistance for Law Enforcement Act (CALEA).[2]

Precision Broadband LLC appreciates the opportunity to speak with members of the Commission and staff. Please feel free to contact me if you have any questions.

Sincerely,
/s/
Charles H. Simon, Jr.
CEO and Founder, Precision Broadband LLC

cc: Dr. Eric Burger (via email)
Mr. Allen Zoracki, Klein Law Group PLLC
Attorneys for Precision Broadband LLC (via email)

[1] Comments Of Precision Broadband LLC, In the Matter of Location-Based Routing for Wireless 911 Calls, PS Docket No. 18-64, Section V. Economics, pages 10 and 11. *Available at*: https://ecfsapi.fcc.gov/file/1050190070698/Precision%20Broadband%20Comments-PS%2018-64%202018-5-1%20.pdf

[2] Title 18 U.S. Code § 2706